

Connect America Phase II Challenge Process Form
OMB Control Number 3060-1188
FCC Form 505

Filing Entity: All West Communications, Inc.

FRN (if applicable): 0004924809

Name of Person Filling Out Form: Gerard J. Duffy

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Name of Person Certifying Data within Form: Jack Walkenhorst

Mailing Address of Person Certifying Data within Form: 50 West 100 North, Kamas UT 84036

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Phone Number of Person Certifying Data within Form: 435-783-4938

Served to Unserved Challenge

Census Block 15 Digit FIPS Code	State	Provider Name As Listed in National Broadband Map	Insert X if Speed Criteria Not Met	Insert X if Usage Allowance Criteria Not Met	Insert X if Latency Criteria Not Met	Insert X if Price Criteria Not Met	Insert X if Voice Criteria Not Met	Type of Supporting Evidence	Additional Comments
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Census Block 15 Digit FIPS Code	State	Name of Entity Providing Service	FRN used to File Form 477 (in challenge being filed by the service provider)	Insert an X if you certify that this census block is served by unserved broadband and voice services meeting the Commission's performance and pricing criteria.	Type of Supporting Evidence	Additional Comments	OMB Control Number 3060-1188
490439641022132	UT	All West Communications,	0004924809		Exhibit A	Census Block wholly in All West's Utah study area	
490439641022167	UT	All West Communications,	0004924809		Exhibit A	Census Block wholly in All West's Utah study area	
490439641022210	UT	All West Communications,	0004924809		Exhibit A	Census Block wholly in All West's Utah study area	
490439641022208	UT	All West Communications,	0004924809		Exhibit A	Census Block wholly in All West's Utah study area	
490439641022207	UT	All West Communications,	0004924809		Exhibit A	Census Block wholly in All West's Utah study area	
490439641022171	UT	All West Communications,	0004924809		Exhibit A	Census Block wholly in All West's Utah study area	
490439641022168	UT	All West Communications,	0004924809		Exhibit A	Census Block wholly in All West's Utah study area	
490439641022124	UT	All West Communications,	0004924809		Exhibit A	Census Block wholly in All West's Utah study area	
490439641022010	UT	All West Communications,	0004924809		Exhibit A	Census Block wholly in All West's Utah study area	
490439641022013	UT	All West Communications,	0004924809		Exhibit A	Census Block wholly in All West's Utah study area	
490439641022131	UT	All West Communications,	0004924809		Exhibit A	Census Block wholly in All West's Utah study area	

Case No. Book 15 Digit NPS Code	State	Name of Entity Making Initial Challenge	FIR of Entry Making Initial Challenge (if possible)	Insert X if Entry Challenge is in 1990s	Insert X if Entry Challenge is in 1990s	Insert X if Entry Challenge is in 1990s	Insert X if Entry Challenge is in 1990s	Insert X if Entry Challenge is in 1990s	Type of Supporting Evidence	Additional Comments	OMB Control Number 3040-1182
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OMB Control Number 3060-1188

Accuracy and Due Diligence Certification

All Filers Must Fill Out

By initialing below, I certify that all statements contained in the attached form are true and accurate to the best of my knowledge, and that I have undertaken due diligence to obtain knowledge regarding these claims.

Certifier's Initials: JW

Date: 8/14/2014

Notice of Challenge Certification

(Served to Unserved and Unserved to Served Challengers Fill Out One of the Following Blocks - Respondents Do Not Fill Out)

Service of Notice Successful

By initialing below, I certify that notice of this challenge has been served on all interested parties.

Certifier's Initials: JW

Date: 8/14/2014

Service of Notice Unsuccessful

By initialing below I certify that, following a good faith effort, I was unable to serve notice of this challenge on all interested parties due to lack of information regarding the address of such parties.

Name of Party/Parties
that Could Not Be

Served:

Certifier's Initials:

Date:

The certifications on this page are subject to the penalties for false statements under 18 U.S.C. 1001.

EXHIBIT A

The reason for the All West Communications, Inc. challenge is that eleven (11) Census Blocks have been incorrectly categorized as eligible because they are actually located entirely within the Utah study area of All West Communications, Inc. ("All West"), a rate-of-return carrier (Study Area Code: 502288). In addition, seventeen (17) other Census Blocks listed as being eligible are actually split between All West's Utah study areas and the Utah study area of CenturyLink/Qwest Corporation ("CenturyLink"), a price cap carrier (Study Area Code: 505107). Separate portions of each of these latter Census Blocks are served by each company.

All West's Jordanelle, Utah exchange includes the entirety of the following eight (8) Census Blocks: 490439641022132, 490439641022167, 490439641022210, 490439641022208, 490439641022207, 490439641022171, 490439641022168, and 490439641022124. All West's Coalville, Utah exchange includes the entirety of the following three (3) Census Blocks: 490439641022010, 490439641022013, and 490439641022131. No part of these eleven Census Blocks falls within the study area of CenturyLink or any other price cap carrier.

Some of the confusion over the proper status and study area of these Census Blocks may be due to the fact that All West and Qwest Corporation ("Qwest") jointly petitioned the Commission on November 13, 2007 for a waiver of their study area boundaries to adjust the boundaries of All West's Jordanelle, Utah exchange and Qwest's Park City, Utah exchange in the area of the Promontory Ranch Club (Attachment A). Subsequently, on December 18, 2008, All West and Qwest amended their study area waiver petition to transfer a portion of Qwest's Wasatch, Utah exchange to All West's Coalville, Utah exchange (Attachment B). On December 26, 2012, the Wireline Competition Bureau granted the study area petition, as amended. Public Notice (*Wireline Competition Bureau Grants Qwest/All West Joint Petition for Study Area Waivers*), CC Docket No. 96-45, DA 12-2074, released December 26, 2012 (Attachment C). Some of the Census Blocks listed above and below were involved in the study area boundary changes that were approved in the waiver. Moreover, the Public Service Commission of Utah orders attached to the waiver petition and amendment detail the subject revised exchange boundaries.

In addition, the attached color-coded map (Attachment D) shows the subject Census Blocks in magenta, and the All West exchange boundaries that encompass them in blue.

Finally, whereas All West is aware that the Commission has indicated that challenges may be filed where a Census Block is entirely within a rate-of-return study area, it nonetheless wishes to note that the following twelve (12) Census Blocks listed as eligible are served, in part, by its Jordanelle, Utah exchange and are partially located within All West's Utah study area: 490439641022206, 490439641022172, 490439641022131, 490439641022216, 490439641022146, 490439641022144, 490439641022135, 490439641022121, 490439641022143, 490439641022140, 490439641022137, and 490439641022212. Also, the following five (5) Census Blocks listed as eligible are served, in part, by All West's Coalville, Utah exchange and are partially located within All West's Utah study area: 490439643061018, 490519604001037, 490439641022081, 490439641011212, and 490439641011124.